

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

VOLTERRA SEMICONDUCTOR	)	
LLC,	)	
	)	Redacted - Public Version
Plaintiff,	)	
	)	
v.	)	C.A. No. 19-2240-CFC-SRF
	)	
MONOLITHIC POWER SYSTEMS,	)	
INC.,	)	
	)	
Defendant.	)	

**DEFENDANT MONOLITHIC POWER SYSTEMS, INC.'S  
CONCISE STATEMENT OF FACTS IN SUPPORT OF ITS  
MOTION FOR SUMMARY JUDGMENT (NO. 3) OF INDEFINITENESS  
OF CLAIMS 17, 18, 20, 21, AND 23 OF US PATENT NO. 6,362,986**

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Dated: November 19, 2021

<b>Exhibit</b>	<b>Description</b>	<b>Pages</b>
Exhibit 8	U.S. Patent No. 6,362,986 (The “’986 patent”). MAXIM_00007958.	All
Exhibit 27	U.S. Patent No. 6,362,986 File History MAXIM_00006448.	All
Exhibit 28	Investigating Coupling Inductors in the Interleaving QSW VRM (“Wong Investigating”). MPS DE-00001780	All
Exhibit 29	Joint Claim Construction Brief. D.I. 168.	19
Exhibit 30	Aaron Schultz Deposition	1-4, 185-212, 221-232

1. The parties have stipulated that the preamble of the '986 patent is limiting. Exhibit 29 at 19.

2. At the *Markman* Hearing on November 12, 2021, the Court adopted the parties' stipulated construction of "orienting, in like direction" as "placing the first and second windings such that the flux generated by the windings flows in *opposite directions* when the windings are activated with a positive current."

3. Claim 17 of the '986 patent claims a "method for reducing ripple in a DC-to-DC converter of the type producing an output voltage from an input voltage." Exhibit 8 at claim 17.

4. Asserted Claim 17 requires "orienting, in like direction, first and second windings about a common core to increase coupling between the windings." Exhibit 8 at claim 17.

5. The specification describes "a prior art article entitled *Investigating Coupling Inductors in the Interleaving QSW VRM* ('Wong Investigating')" and admits that the benefit of the method disclosed in *Wong Investigating* "is limited in that it only offers slight reduction in ripple at some duty cycles for limited amounts of coupling." Exhibit 8 at 1:54-59.

6. The '986 patent states that, "[w]hen both low-side devices are on, then the excitation on the two windings is in the same direction, as in Fig. 9, and flux will follow only the leakage paths 112. As a result, each winding's falling current slope

is the same as if there were no coupling between the two inductors.” Exhibit 8 at 9:58-63.

7. The ’986 patent further states “when one high-side switch and one-low side switch is on, then the flux is shared, as in FIG. 8, with the result of lower reluctances in the flux path and smaller current ripple than had there been no coupling.” Exhibit 8 at 9:63-66.

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**CERTIFICATE OF COMPLIANCE WITH STANDING ORDER  
REGARDING BRIEFING**

I hereby certify that the foregoing complies with the typeface requirements and word limits of Paragraph 20(c) of the Scheduling Order entered in this case (D.I. 69). This brief has been prepared in 14-Point Times New Roman and contains 294 words, excluding the cover page, signature block, and this certificate of compliance.

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**CERTIFICATE OF SERVICE**

I, Andrew E. Russell, hereby certify that on November 19, 2021, this document was served on the persons listed below in the manner indicated:

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